

Mark R. Vermeulen [CSBN 115381]  
Law Office of Mark R. Vermeulen  
755 Florida Street #4  
San Francisco, CA 94110.2044  
Phone: 415.824.7533  
Fax: 415.824.4833

Attorney for Defendant  
BERNADETTE ESCUE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 07-00610 JF
	)	
Plaintiff,	)	<b>STIPULATION AND [Proposed]</b>
	)	<b>ORDER CONTINUING SENTENCING</b>
v.	)	
	)	
BERNADETTE ESCUE,	)	
	)	
Defendant.	)	
	)	

Defendant Bernadette Escue, through counsel, and Plaintiff United States of America, through counsel, hereby stipulate as follows:

1. Sentencing currently is set for February 20, 2008. By this stipulation and proposed order, the parties respectfully request that the sentencing hearing be continued to April 16, 2008.

2. Ms. Escue has pled guilty to a violation of 18 U.S.C. § 1343 (mail fraud), having entered her plea on the first appearance before this Court.

3. On January 10, 2008, the Government produced FBI 302 reports to the defense. Upon the defense's review of the reports, the defense has determined that it needs to investigate certain matters contained in the reports which may be relevant to sentencing. This continuance is requested to permit the defense to do so. The length of the continuance (i.e., from February 20 to April 16) is necessary because the reports concern events and statements that are said to have occurred in 2004, and investigation of these matters may be more complicated and lengthy than usual.

